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AO 91 (REV.5/85) Criminal Complaint — AUSA Scott M. Edenfield (312) 353-5277

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SALVADOR ELIAS,
also known as "Kasper,;"
ADRIAN ELIAS,
also known as "Soldier,"
ANGEL OLSON,
DEMETRIO BENITEZ,
MIGUEL LEDESAMA,
PAUL REDING,
CORNELIUS SISTRUNK,
DEERIC STEVENS, and
MISHON WASHINGTON

CRIMINAL COMPLAINT

FILED

CASE NUMBER:

JUN - 5 2013

THOMAS G BRUTON
CLERK, U S DISTRICT COURT

13 CR 476

MAGISTRATE JUDGE SCHENKIER

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: Beginning from on or about May 14, 2013, and continuing until on or about June 4, 2013, in the Northern District of Illinois, Eastern Division, and elsewhere, SALVADOR ELIAS, also known as "Kasper," ADRIAN ELIAS, also known as "Soldier," ANGEL OLSON, DEMETRIO BENITEZ, MIGUEL LEDESMA, PAUL REDING, CORNELIUS SISTRUNK, DEERIC STEVENS, and MISHON WASHINGTON, defendants herein:

> did conspire with each other and with others known and unknown to knowingly and intentionally possess with the intent to distribute and to distribute a controlled substance, namely, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

in violation of Title 21, United States Code, Section 846. I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

Signature of Complainant
ERIC DORNBUSCH
Special Agent, Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and subscribed in my presence,

June 5, 2013 AT 10:55 A.M.
Date and Time

Chicago, Illinois
City and State

SIDNEY I. SCHENKIER, U.S. Magistrate Judge
Name & Title of Judicial Officer

Signature of Judicial Officer

UNITED STATES DISTRICT COURT)
) ss
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Eric Dornbusch, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") and have been so employed since December 2009. My duties include investigating violent crimes, narcotics trafficking offenses, and the possession, use, and sale of firearms.

2. During my employment as an ATF Special Agent, I have personally conducted or assisted in hundreds of criminal investigations. Those investigations have employed a variety of investigative techniques, including but not limited to the following: (a) physical surveillance; (b) debriefing of defendants, witnesses, informants, and other individuals who have knowledge concerning violations of federal firearms laws; (c) undercover operations; (d) execution of search warrants; (e) consensual monitoring and recording of conversations; (f) electronic surveillance through the use of pen registers and trap and trace devices; and (g) handling and maintenance of evidence.

3. This affidavit is submitted in support of a criminal complaint alleging that there is probable cause that SALVADOR ELIAS, also known as "Kasper" ("S. ELIAS"); ADRIAN ELIAS, also known as "Soldier" ("A. ELIAS"); ANGEL OLSON; DEMETRIO BENITEZ; MIGUEL LEDESMA; PAUL REDING; CORNELIUS SISTRUNK; DEERIC STEVENS; and MISHON WASHINGTON (collectively, the "defendants"), did conspire with each other, and with others known and unknown, to knowingly and intentionally possess with intent to distribute

and to distribute five kilograms or more of cocaine, in violation of Title 21, United States Code, Section 846.

4. Because this affidavit is being submitted for the limited purposes of establishing probable cause in support of a criminal complaint charging the defendants with conspiracy to possess with intent to distribute and to distribute five kilograms or more of cocaine, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

5. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, law enforcement records, information provided by a confidential source, and my review of consensually recorded conversations and meetings[1].

The Confidential Informant

6. The investigation was initiated in part on the basis of information provided by an ATF confidential informant ("CI") who has a prior criminal history that includes a murder conviction. The CI has provided information to the ATF since approximately October 2012 and has previously provided information to the Chicago Police Department and the FBI. Information provided by the CI has proven reliable and has led to arrests and the seizure of evidence. The CI is providing assistance in exchange for financial compensation. He has been paid by ATF in the past and expects to continue to be paid by ATF.

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[1] Not all recorded conversations are set forth in this affidavit, and the recorded conversations referenced have been summarized. The content of the conversations are preliminary summaries based on my review of recordings and recollections of the monitoring of these consensually recorded calls and meetings, and not final transcriptions of the consensually recorded phone calls and meetings. The times listed for these conversations are approximate. The summaries below do not include all statements or topics covered during the course of the intercepted conversations. At various points in the affidavit, I have included in brackets my interpretation of words and phrases used in the recorded conversations. My interpretations are based on information received from the undercover law enforcement agent, the contents and context of the recorded conversation, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents in this investigation.

The May 14, 2013, Meeting and Subsequent Phone Calls Between the CI and S. ELIAS

7. On May 15, 2013, another ATF agent and I met with the CI. The CI stated that one of his/her friends had introduced the CI to an individual the CI knew as "Kasper," later identified as S. ELIAS.[2] The CI stated that on May 14 he/she had met with S. ELIAS at what S. ELIAS identified as his home in Round Lake Beach, Illinois. The CI informed agents that S. ELIAS had told the CI that S. ELIAS was a Surenos gang member and further told the CI that he "calls all the shots for all the guys out here." S. ELIAS also said that he and his gang made money by robbing drug dealers and stash houses.

8. The CI then told S. ELIAS that he/she knew a courier for a drug cartel working in Chicago. The CI further stated that the courier had told him/her that he was not happy with his employer and was looking for a professional crew to help him rob the cartel's drug house. The CI told S. ELIAS that the courier had said that there were over twenty kilograms of cocaine in the stash house at any one time.

9. The CI stated that later on the day of May 14, 2013, he/she advised his/her friend to provide S. ELIAS with the CI's phone number. At approximately 3:30 p.m., the CI noticed a missed call from a number he/she did not recognize ("S. Elias Phone"). The CI placed an unrecorded call to the number, and a voice the CI recognized as S. ELIAS answered. During the call, S. ELIAS agreed to meet the CI and the courier the following Monday, May 20, 2013. S. ELIAS suggested that the CI meet with S. ELIAS and his crew between Round Lake Beach and Chicago and drive together to meet the courier. The CI agreed.

10. On Monday, May 20, 2013, at a few minutes after 4:24 p.m., at the direction of law enforcement, the CI placed a monitored and consensually recorded telephone call to the S.

2 At the end of our May 15, 2013, meeting with the CI, we showed the CI a photograph of S. ELIAS, who the CI identified as Kasper.

Elias Phone. S. ELIAS answered the phone. During the call, S. ELIAS stated that he could not meet that day, as originally planned. The CI and S. ELIAS agreed to meet the CI the next day at around 5 p.m. at a location on the north side of Chicago. Towards the end of the call, S. ELIAS thanked the CI for telling S. ELIAS about the potential robbery, stating, "I meant to tell you, good lookin' out man, I appreciate it."

11. A few minutes after 5:45 p.m. on May 20, 2013, the CI placed a monitored and recorded telephone call to the S. Elias Phone. After S. ELIAS answered, the CI explained to S. ELIAS that the courier wanted to meet with S. ELIAS' crew the next day to discuss plans for the robbery and how they would split the cocaine robbed. The CI explained that the next day was just a meeting and that the courier was not looking to conduct the robbery that day. S. ELIAS responded, "you wanna make it fly [do the robbery] tomorrow?" The CI said no and explained that the courier just wanted to meet. Towards the end of the call, S. ELIAS confirmed that he would meet the CI the next day between 4:00 and 5:00 p.m.

The May 21, 2013, Meeting Between S. ELIAS, A. ELIAS, the CI, and the UC

12. On May 21, 2013, other ATF agents and I conducted surveillance of S. ELIAS and A. ELIAS[3] while they drove with the CI to an ATF Undercover Meet Location ("UML") to meet with an undercover ATF agent posing as a disgruntled drug courier ("UC"). Prior to this meeting, agents equipped the CI's car with a disguised audio/video recorder and a transmitter.

13. At approximately 5:46 p.m., I observed S. ELIAS and A. ELIAS driving in a black Chevrolet sedan. I observed S. ELIAS and A. ELIAS park that sedan close to the CI's vehicle at the previously-agreed-to location. I then observed S. ELIAS and A. ELIAS exit the

3 Officers identified A. Elias by showing a photograph of A. Elias to the CI and UC, who identified A. ELIAS as the individual they metwith.

sedan and enter the CI's vehicle. At approximately 5:47 p.m., another ATF agent observed the CI's vehicle exit the parking lot and head towards the UML.

14. During the drive to the UML, the CI asked S. ELIAS what he thought about the robbery plan. Based on my review of the reports, the recording, and conversations with other officers, S. ELIAS told the CI, "I think if you know you say it is, then it's real, everyone is down, you know." S. ELIAS also told the CI, "everybody is just you know...Man 20, 20 of them things! Man...they got to have, got to have mad fuckin'...you know what I am saying...the whole system."

15. The CI also asked S. ELIAS how many guys S. ELIAS had in his crew. S. ELIAS stated, "with me it would be like five." The CI asked S. ELIAS if S. ELIAS had firearms. S. ELIAS stated, "yep...I got the bangers [guns], I got the cats [people to do the robbery], and I got the trap [place to hide the drugs after the robbery], you know what I am saying ... and I got a nigga that does storage units, so we got it all, you know what I am saying?"

16. S. ELIAS also suggested to the CI that they store the stolen drugs for a time before attempting to sell them. S. ELIAS stated, "you know my, my, my cat, one of my cats, he's like, he's 30-something, you know...he's, he's like you, he's like you know the only thing like, like he was telling me. Like you should tell them niggas that once we cuff it, put it away for at least, at least a couple weeks and make sure everything cools down, you know what I am saying, before you go in there and touch it."

17. S. ELIAS later suggested that the crew might pose as police officers, stating, "One of my niggas was thinking though, like, you know 'Boxer'?" When S. ELIAS asked this question, he had turned to look at A. ELIAS in the backseat. S. ELIAS continued, "You know how he got those vests?" At this point, A. ELIAS was observed on video nodding. S. ELIAS

then explained to the CI, "This nigga got vests with, I mean they're not full fuckin' vests, you know, but they got the police, you know what I am saying." S. ELIAS further stated his guy told him to use the vests "so these niggas cease fire, you know?"

18. S. ELIAS asked the CI, "Can you get a lot of thumpers [guns] out here, or not so much?" The CI said, "Yeah." The CI asked S. ELIAS, "What about over there?" S. ELIAS said, "Over there you get some good ass shit." He continued, "whatever, clean . . . choppers, Berettas . . . there's a lot of white motherfuckers out there, so you know they got all types of fuckin' FOID cards, you know what I am saying? They want to make money so, you know, they going to do something to get it. You offer them this much, you go look at the price, 'alright yeah I will do that for you.'" S. ELIAS stated, "I got a pump and a…a mother fuckin' rifle with a scope and everything for $250 bro'." S. ELIAS continued, "I had a little .22 Pathfinder…I got a single shot .22 long barrel, fuckin, what is it, a six or a eight? I think it is a six."

19. S. ELIAS asked the CI, "You don't know if the niggas [the targets of the robbery] are cartel? Or if they just fuck with the cartel?" The CI told S. ELIAS that he/she did not know. S. ELIAS said, "They got to be something right? We gonna rob the mother fuckin' cartel, 2013 boy."

20. At approximately 6:23 p.m. agents observed the CI's vehicle enter into the back alley of the UML. At that time, the UC met with S. ELIAS, A. ELIAS, and the CI. The UML contained audio and video recording devices that captured the conversations and parties present at the meeting. In addition, the UC was wearing a disguised audio/video recorder that also captured the meeting. Throughout the meeting, the UC, S. ELIAS, and A. ALIAS remained together.

21. Based on my review of the audio and video recordings, as well as my conversations with the UC and CI, the following conversation occurred. S. ELIAS asked the UC, "What's the blueprint? What's it looking like?" The UC told S. ELIAS and A. ELIAS that he was a drug courier who moved kilograms of cocaine from a stash house to customers for a Mexican drug supplier named "Carlos." The UC said that when he picked up cocaine from the stash house, he would always see between twenty and thirty kilograms of cocaine in the house. The UC further advised that the two men who guarded the stash house always had firearms to protect from any robbery attempts. The UC stated that he was looking for a crew to rob the stash house but did not want "Carlos" to know who set him up.

22. S. ELIAS explained to the UC how he and his crew worked. Specifically, S. ELIAS told the UC, "This is how we do it. Every time we get a lick you know, we gotta make sure we got cars, the right motherfucker who's not gonna freeze, and have a trap house where we can move this shit. I got all that, I got the guys, the guns, the trap house. I got the car, whatever."

23. The UC expressed his concern that the drug supplier not know that he set up the robbery. S. ELIAS advised that it was possible that the supplier would know, but that they could do things to throw the supplier off. S. ELIAS said, "If it was like that bro, we'd have to beat your ass literally, know what I am saying? I mean I'd have to shoot." S. ELIAS then turned to A. ELIAS and said, "I mean, with Cholo and them I had to beat the shit outta dude, jack 'em up, tie 'em up. Know what I am saying? Blooh! I had to blow one of his legs in because if not it wasn't gonna look real, bro." A. ELIAS added, "The bitch, too!" S. ELIAS continued, "Yeah, the bitch was in on it; you know we had to beat her ass too—we went in there, tied this motherfucker up—if they got Tecs, motherfucker got to come in there quick right behind you." A. ELIAS advised,

"We might have to pop somebody in the leg you know?" The UC asked if he would have to get shot. A. ELIAS advised "No, no, not you."

24. The UC later asked S. ELIAS how many guys he would bring to conduct the robbery. S. ELIAS stated, "I want to have at least five cats plus us. Seven people, yeah man, 'cause what if they got, what if there's someone in the back, hiding out, in the bushes, two niggas on each side in the bushes you don't know that, you saying they big time, obviously cartel right? So man, they gonna buck."

25. S. ELIAS and the UC next discussed the logistics of the robbery. S. ELIAS asked about the positioning in the room of the men with the guns and what time of day the UC made his pick-ups. S. ELIAS said, "It's dark when you do it right? That's good though, that's the plus. Most of the time we have to go in in daylight in the middle of motels, when motherfuckers coming out of the car and niggas inside. There's one nigga coming out of the car and there's another motherfucker in a motel looking out so you know we gotta hit fast, you know what I'm saying? There's been times motherfuckers get to shooting back, that's when we get stuck, that's when we have to pop motherfuckers—we ain't trying to go in there and pop nobody to be honest with you—we just trying to get the work."

26. S. ELIAS later sketched out the stash house on the floor of the UML and told the UC, "So this the motherfucking place right. This is the door, you come in, we come in behind you, push you out of the way, we go straight for the cats. Two motherfuckers concentrate on another one. Two motherfuckers on another one. Another motherfucker making sure everything is right. One in the back, one in the front, the niggas goes in don't even look, put it in the truck, he gets in the car, let's go, vroom. You know what I'm saying, it's over with. Shoot one in the leg so they don't get up—let them cry like a bitch, you know what I'm saying? We gone."

27. S. ELIAS told the UC, "Before this shit happens, we'll come out here and kick it, you and my guys. Set up a day, talk about it and drink some beers." S. ELIAS told the UC that he would give the UC his personal cellular telephone number when he returned home. The UC then provided his undercover cellular telephone number to S. ELIAS

28. At approximately 7:08 p.m., ATF agents observed S. ELIAS, A. ELIAS, and the CI leave the UML in the CI's vehicle. During the ride in the CI's vehicle back to S. ELIAS' parked car, S. ELIAS and A. ELIAS continued to discuss the robbery with CI. This conversation was captured on audio and video.

29. Based on my review of the audio and video recordings, as well as my conversations with the UC and CI, the following conversation occurred. S. ELIAS told the CI, "I got the right niggas for this…this is an easy lick boy." S. ELIAS then told the CI "Yeah, but we is going to need at least 4 other cats, boy."

30. S. ELIAS also discussed bringing guns to the next meeting. S. ELIAS said, "You know what, I might as well go ahead and bring the straps down here when we come, because that way we don't have to ride around and risk it, in case some nigga get pulled over." The CI told S. ELIAS, "Your best bet is to bring them down the day of the job." S. ELIAS responded, "Yeah, yeah, fuck it…the only thing I need is to get shells for that one shottie, I got to take care of that ASAP."

31. S. ELIAS then told the CI, "Man, if I can, I'll go ahead and cuff, cuff a mother fucking silencer to just blast these niggas, you know. The first nigga that walks in, da,da,da, fuck it, lay them out…Yeah I am going to look into that ASAP, boy." S. ELIAS then asked the CI if he had a gun: "You going to need a thumper or you, or you got your little thumper?" After the CI

answered, "I'm straight," S. ELIAS told the CI, "Your best bet is to bring revolvers boy, you know, so you don't drop no shells."

32. S. ELIAS also discussed a previous robbery with the CI. He said, "We had harder licks then that bro…We've had licks where we had to sit there and wait for the money, you know what I am saying? Had some hostages." S. ELIAS continued, "Like with Truquito, right?" A. ELIAS responded, "Yeah." S. ELIAS continued, "Put us up on a lick where this nigga from Mexico came." S. ELIAS described the robbery as follows: "This nigga came with big money, talking loud at a bar….he called us…gave me the blue print, 'alright this nigga is like this, he is hollering at my girl already…So my girl was hitting,' his girl was in on the lick. . . . . We took him to the trap. Tied him up, beat his ass, beat the girl's ass, pretend you rape her, you know what I am saying? Scare the shit out of this nigga, you know, so he gives up the loot…Let this nigga know, you know, we want the money." The CI asked S. ELIAS what happened. S. ELIAS said, "We got the fuckin' dough and ah, and the only bad part is, this nigga dipped on us….yeah that nigga did us bogus. That was the only lick we got treated on bro…Stick up ain't no problem, know what I am saying? What you got to make sure is the other nigga ain't going to pull it first."

May 28, 2013, Phone Calls Between S. ELIAS, the CI, and the UC

33. On May 28, 2013, at approximately 12:48 p.m., the UC noted a series of missed incoming telephone calls from the S. Elias Phone. At approximately 12:51 p.m., at the direction of law enforcement, the UC placed a consensually recorded call to the S. Elias Phone. When S. ELIAS answered, the UC suggested a meeting on May 30, 2013. S. ELIAS stated that he and his crew were unavailable on that date and suggested the weekend.

34. On the same day, at approximately 4:44 p.m., the UC noted another missed incoming telephone call from the S. Elias Phone. The UC then placed a consensually recorded

call to the S. Elias Phone, which was answered by S. ELIAS. During the call, S. ELIAS expressed concern that the UC wanted to get the robbery over, get his share, and leave the crew behind. S. ELIAS indicated that he wanted the UC to stay in touch and alert the crew to possible danger and not steal their share. He said, "Look we just did one last week and this dumb ass nigger, he literally left with my cut. It's over and gone. I don't know anything about dude. I lost all my money." S. ELIAS further stated that the UC and the crew needed to discuss and rehearse the robbery and decide "who is gonna be where." S. ELIAS further stated, "I am not taking any fucking chances, Joe. We had too many situations where we think it's sweet as fuck and we run in there and three motherfuckers jump out and we had to gun fight out that bitch. You know what I am saying?"

35. In a consensually recorded call at approximately 6:21 p.m. on the same day, the UC and S. ELIAS agreed to meet the following Sunday, June 2, 2013.

The June 2, 2013, Meeting Between S. ELIAS, A. ELIAS, ANGEL OLSON, FNU LNU, the UC, and the CI

36. On June 2, 2013, prior to the undercover meeting, the CI and the UC were equipped with audio and video recording devices. At approximately 3:28 p.m., the UC observed the CI's vehicle drive into the UML. The UC observed the CI, S. ELIAS, A. ELIAS, an unidentified male "FNU LNU," and an individual later identified as ANGEL OLSON[4], exit the car. The UC greeted S. ELIAS, and A. ELIAS introduced FNU LNU and OLSON.

37. Based on my review of the audio and video recordings, as well as my conversations with the UC and CI, the following conversation occurred. S. ELIAS told the UC, "Lay it down with them like you did that one day. Tell us from the beginning how you know dude, why you doing it." The UC then told all the men that he was a courier for a cocaine

4 OLSON was not identified until the time of his arrest, when he provided biographical data.

supplier and that he regularly transported kilogram quantities of cocaine for a source who maintained a stash house. The UC advised that the locations of these stash houses changed with each pick-up and that the UC had no prior notice of the location of these stash houses. The UC further advised that he always saw at least twenty kilograms of cocaine in the stash house and explained that the cocaine was always guarded by two men armed with firearms.

38. S. ELIAS then discussed the specifics of the robbery. He told the UC, "I think it be best if you go in, put 'em at ease and once you coming out we . . pop it." A. ELIAS said, "You kinda got to distract them so they don't see us coming." The UC asked the men if they would tie him up as well as the stash house armed guards. S. ELIAS responded, "We got to bro, we're gonna have to kick your ass a little bit, bro."

39. S. ELIAS later described the gun he was going to bring to the robbery, saying "I'm gonna take a shotty; I'm gonna handle that bitch 'cause if they try to move bro, we gotta do what we gotta do." A. ELIAS agreed and explained that they might have to shoot someone. A. ELIAS stated, "We gonna have to do it, man. S. ELIAS elaborated saying, "I'm gonna take the shotty . . . two revolvers and a .45.

40. S. ELIAS then discussed his crew. S. ELIAS said that he would probably bring two drivers but that the UC did not have to meet with the drivers until the day of the robbery.

41. S. ELIAS then discussed the tactics of the robbery again. During that conversation, OLSON suggested that the crew could use tear gas to direct the armed guards' attention. FNU LNU and S. ELIAS dismissed the idea, saying that the crew did not have a gas mask and could not obtain one soon enough to complete the robbery.

42. The UC and S. ELIAS ended the meeting by agreeing agreed to speak when the UC received a call from his supplier.

The June 4, 2013, Meeting Between the Defendants, the UC, and the CI

43. During the days eading yup to the attempted robbery. S. ELIAS and the UC exchanged phone calls. At approximately 9:33 p.m. on June 2, 2013, the UC placed a consensually recorded call to S. ELIAS. During that call, the UC advised S. ELIAS that the pickup would take place on June 4, 2013. The UC advised S. ELIAS to have his crew ready.

44. On June 3, 2013, at approximately 4:42 p.m., the UC placed a consensually recorded call to S. ELIAS and confirmed that S. ELIAS should bring his crew down the following evening. The UC told S. ELIAS to meet the CI at 7:00 p.m. at a location on the north side of Chicago.

45. On June 4, 2013, ATF agents set up surveillance at the location where the CI was to meet the subjects, as well as the location where the subjects were to meet the UC. Prior to initiating the surveillance, agents searched the CI and his vehicle for weapons and contraband. That search did not locate any weapons or contraband. The UC was also provided with a disguised audio and video recording device in advance of the meeting.

46. At approximately 7:18 p.m., ATF agents observed a GMC Avalanche and a Chevy Sonic arrive at the CI's location. ATF agents then observed the CI's vehicle, followed by the Avalanche and the Sonic, drive to a location near an ATF undercover warehouse ("UW"), where the UC was waiting.

47. When the Avalanche and the Sonic arrived, the UC approached the Sonic and observed four individuals inside the car, including S. ELIAS. The UC asked S. ELIAS if his crew was ready. Based on my conversations with the UC, the following conversation occurred. S. ELIAS responded that they were ready but that they needed a place to "load up." The UC asked S. ELIAS if he had "the toys [the guns]" and S. ELIAS confirmed that he did. The UC

informed S. ELIAS that he had a warehouse nearby where they could wait and prepare and asked S. ELIAS to follow him there. The UC then drove to the UW, followed by the Avalanche, the Sonic, and the CI's vehicle.

48. The UW was equipped with audio and video recording equipment, which, in addition to the device used by the UC, captured the conversations in the UW. When the Avalanche and the Sonic arrived at the UW, eight of the defendants exited the two vehicles. A ninth individual, later identified as PAUL REDING, remained in the front passenger seat of the Avalanche.

49. According to the UC, the eight defendants other than REDING then discussed the planned robbery with the UC. That discussion, however, took place within a few feet of REDING's car window, which was rolled down. Based on my conversations with the UC, S. ELIAS asked the UC to tell the men about the robbery again. The UC stated that he was a courier for kilogram amounts of cocaine. He stated that when he picked up the narcotics, there were always at least twenty kilograms of cocaine. The UC stated that there were two armed men who guarded the stash house.

50. The UC then asked the men if they were comfortable with the robbery and stated that if they were not comfortable, this was the time to say so. None of the defendants indicated any concerns with the robbery.

51. According to the UC, S. ELIAS then discussed how the robbery would take place and gave instructions to the men other than REDING. While S. ELIAS was providing instructions, the subjects passed around three guns brought to the UW by the defendants: a shotgun and two revolvers. S. ELIAS racked the shotgun several times as he was providing the instructions.

52. The UC advised that S. ELIAS later walked to REDING, who was still inside the Avalanche, and handed him the shotgun. The UC then approached REDING and S. ELIAS. S. ELIAS was speaking with REDING when the UC approached. S. ELIAS told REDING that S. ELIAS knew that REDING wanted to go inside the house but that he needed REDING to remain in the Avalanche during the robbery to keep a lookout on the outside. S. ELIAS then told theUC that REDING was the person who would store the cocaine after the robbery.

53. The UC asked REDING if he was comfortable with the robbery, and informed him that there were approximately twenty kilograms of cocaine at the stash house. REDING stated that he was comfortable with the robbery.

54. After further conversations about the robbery among the defendants the UC gave the arrest signal and the nine defendants were arrested.

55. ATF agents seized the two revolvers and the shotgun from the UW. They also recovered a roll of blue electrical tape from the Avalanche and a black glove from the Sonic. During a search of LEDESMA, Agents located and seized a bandana and two sets of brass knuckles.

56. Agents also recovered a shoebox containing ammunition for the revolvers and the shotgun as well as two additional bandanas.

Post-Arrest Statements

57. S. ELIAS orally waived his Miranda rights and agreed to be interviewed by other investigators and me. Among other things, S. ELIAS acknowledged that he was aware of the firearms in the vehicle. He also admitted that he had participated in prior robberies and a kidnapping.

58. BENITEZ waived his Miranda rights orally and in writing. According to law enforcement officers who interviewed him, BENITEZ stated that he learned while at the UW that a robbery would take place. Specifically, BENITEZ stated that at the UW, S. ELIAS explained that they were going to conduct a robbery. S. ELIAS told BENITEZ that BENITEZ was going to hold a gun but that he probably would not have to shoot anyone. BENITEZ stated that the UC had explained that the robbery was of multiple kilograms of cocaine, and BENITEZ admitted that he had been willing to conduct the robbery.

59. SISTRUNK also waived his Miranda rights orally and in writing. According to the law enforcement officers who interviewed him, SISTRUNK admitted that he had found out about the planned robbery two to three days prior. He stated that he was originally told that the robbery was of between $10,000 and $50,000 but was told at the scene that it was a robbery of a cocaine stash house by the UC. SISTRUNK admitted recruiting his brother, DEERIC STEVENS, to join the robbery.

CONCLUSION

60. Based on the foregoing, your affiant submits that there is probable cause to believe that Salvador ELIAS, also known as "Kasper"; Adrian ELIAS, also known as "Soldier;" ANGEL OLSON; DEMETRIO BENITEZ; MIGUEL LEDESMA; PAUL REDING; CORNELIUS SISTRUNK; DEERIC STEVENS; and MISHON WASHINGTON did conspire with each other and with others known and unknown, to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, namely, five kilograms or more of cocaine, in violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

FURTHER AFFIANT SAYETH NOT.

Eric Dornbusch
Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives

SUBSCRIBED AND SWORN to before me on June 5, 2013.

SIDNEY I. SCHENKIER
United States Magistrate Judge